

RM-10995

For Amendment of Part 74 of the Commission's Rules to Provide for Displacement Relief for FM Translator Stations

I am the chief engineer of KUNC, Community Radio for Northern Colorado in Greeley, Colorado. KUNC provides public radio service for much of Northern Colorado's front range with our main transmitter at 91.5. KUNC also provides public radio service to over one third of the state of Colorado through its system of KUNC owned FM translator stations and FM translator station partners. In most cases, these FM translator stations are located in Colorado's rugged mountains to the west or the vast plains to the east. Translators pose greater difficulties to maintain and repair than KUNC's main transmitter due to the rugged and remote locations they tend to be located in. These FM translator stations provide valuable public radio programming to areas not served by any other signal.

FM translator stations are governed under Part 74 of the FCC's rules and are considered secondary service. As such, primary stations that are governed under Part 73 of the FCC's rules can displace FM translators, causing interruption or complete loss of valued public radio service to these remote areas. Under the present rules, only minor modification to an FM translator station's license is permitted when displacement occurs. In order to continue operation, the FM translator station may need to apply for a major modification of its license, which is allowed only during those occasional window-filing periods. In order to prevent loss of public radio service to these underserved areas, I urge the FCC to consider the National Translator Association's proposal to allow minor changes to a displaced FM translator station's license to include moving to any unused FM channel, provided the FM translator station can meet FCC interference and adjacent channel contours.

Thank you.

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